IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

ETHICON WAVE 13 CASES LISTED IN EXHIBIT A OF DEFENSE NOTICE OF

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

ADOPTION

NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF VLADIMIR IAKOVLEV, M.D. FOR WAVE 13

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert response filed in relation to Vladimir Iakovlev, M.D. for Ethicon Wave 4, Dkt. 3790. Plaintiffs respectfully request that the Court deny Defendants' motion, for the reasons expressed in the Wave 4 response briefing.

Dated: December 23, 2019

Respectfully submitted,

/s/ D. Renee Baggett

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CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett_

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